

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

ETHLYN LOUISE HALL, ETHLYN HALL as trustee of the ETHLYN LOUISE HALL FAMILY TRUST, and ELSA EMILY HALL, Plaintiffs, v. SAMUEL HALL, Jr. and HALL & GRIFFITH, PC, Defendants.	3:11-cv-00054 Action for Damages and for an Accounting JURY TRIAL DEMANDED
SAMUEL HALL, Jr., Plaintiff, v. ELSA HALL, Defendant.	Civil No. 3:13-CV-00095 Action for Damages and for an Accounting JURY TRIAL DEMANDED

AFFIDAVIT OF SAMUEL HALL, JR.

I, SAMUEL HALL, being duly sworn depose and say:

1. I am the defendant in the above referenced consolidated action.
2. I am now 75 years old and have health challenges including a bout with cancer that is now in remission.
3. These actions presently pending before this Court are based on diversity of citizenship and involve the exclusive determination of rights under local law.
4. The consolidated actions have been pending before this Court since 2011 and 2013 respectively and I would like the matters concluded by the Court

while I am still capable of testifying on my own behalf and while I am able to aid in the defense against claims.

5. Motions are pending for (1) Summary Judgment on Elsa Hall's Conversion Claim and for Removal of Lis Pendens (ECF 487, 499, 500, 501, 502, 503, 504) and (2) Partial Summary Judgment to Dismiss Legal Malpractice Claims (ECF 489, 490, 491). The issues related to these motions have been fully briefed and if decided, should fully dispose of these claims.

6. The Legislature of the Virgin Islands has amended 5 V.I.C. §31 to provide for preference where persons over 70 years old are parties to a civil action and I, Samuel Hall, by this affidavit, make petition to this Court that it conclude this case as expeditiously as possible.

7. I realize that the District Court may not be strictly bound by the provisions of 5 V.I.C. §31 but hope that the Court shall use it to provide persuasive authority for promptly deciding this consolidated diversity proceeding so as to bring this litigation to a close.

September 6, 2023

/s/ Samuel Hall, Jr